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9 Attorneys for Reply Counterdefendant
 : SONY MUSIC ENTERTAINMENT,
 erroneously sued as SONY MUSIC HOLDINGS,
 INC.
 ;

32 **WP KWGF UVCVGUF KVTKEV EQWTV**
 33 **PQTVJ GTP F KVTKEV QHECNHQTP KC. UCP HTCP EKEQ F KXKUQP**
 34

35 STEVEN AMES BROWN,

36 Plaintiff,

37 v.

38 ANDREW B. STROUD, an individual,

39 Defendant.

3: AND DEFENDANT'S RELATED
 3; COUNTERCLAIMS

42 STEVEN AMES BROWN,

43 Reply Counterclaimant,

44 v.

45 ANDREW B. STROUD, and SONY MUSIC
 46 HOLDINGS, INC.,

47 Reply Counterdefendants.

Case Nos. CV 08-02348 JSW

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 QTF GT'XCECVRPI LQIPV
 O CPFCVQT[UGVVNGO GPV
 EQPHGTGPEG

Date action filed: May 7, 2008
 Judge : Hon. Maria-Elena James
 Place : Courtroom B, 15th Floor

<p>1 LISA SIMONE KELLY, duly appointed 2 administrator of the Estate of Nina Simone, 3 Plaintiff, 4 v. 5 WALLY ROKER, an individual, and d/b/a ICU 6 ENT. DIST.; d/b/a WALLY ROKER MUSIC; 7 ANDY STROUD, INC.; and ANDREW B. 8 STROUD. 9 Defendants.</p>	<p>Case No.: CV 11-5822 JSW</p>
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10 Sony Music Entertainment, the Estate of Nina Simone, and Steven Ames Brown
11 (collectively, "Stipulating Parties"), by and through their respective counsel, submit the following
12 Stipulation and Proposed Order:

13 WHEREAS, Stipulating Parties have sought default judgment in the above-referenced
14 actions against Defendants and Counterclaimants Estate of Andrew B Stroud, Stroud Productions
15 and Enterprises, Inc., and Andy Stroud, Inc. (collectively, "Stroud"), with such motions currently
16 pending before the Hon. Jeffrey S. White;

17 WHEREAS, on or about June 4, 2013, the Court referred the motions seeking default
18 judgment to a randomly assigned Magistrate Judge to prepare a report and recommendation
19 (Docket No. 566 in Case No. 08:2348);

20 WHEREAS, on or about September 4, 2013, the motions were heard by U.S. Magistrate
21 Judge Nathanael Cousins, but no Report and Recommendation has yet been issued;

22 WHEREAS, disposition of those motions will affect the manner in which the various
23 parties approach and effectuate settlement;

24 WHEREAS, on or about June 5, 2013, Stroud filed Notices of Appeal to the Ninth Circuit
25 in the above-captioned actions;

26 WHEREAS, while the Stipulating Parties believe Stroud's appeals are frivolous and
27 improper, and have briefed that issue to the Ninth Circuit, the Ninth Circuit has not yet addressed
28 whether it will maintain jurisdiction over the appeals;

1 WHEREAS, counsel for the Estate of Nina Simone and representatives for Sony Music
2 Entertainment must travel from New York for the settlement conference, and the uncertainty of
3 whether the settlement conference will go forward given the appeals makes scheduling and travel
4 plans burdensome and difficult;

5 WHEREAS, Stipulating Parties believe that allowing time for resolution of the propriety of
6 the Ninth Circuit Appeals, and of the pending motions seeking default judgment, will facilitate
7 settlement, improve efficiency, and lessen the burden on the Court and the parties;

8 THEREFORE, the Stipulating Parties respectfully request that the Mandatory Settlement
9 Conference currently set for September 25, 2013 be put over for approximately 60 days to a date
10 acceptable to the Court and the parties. The parties will timely meet and confer and convey
11 mutually acceptable date(s) to the Court's clerk.

12 | IT IS SO STIPULATED.

13 | Dated: September 13, 2013

Respectfully submitted,

/s/ Steven Ames Brown
STEVEN AMES BROWN,
Plaintiff in *Pro Se*

/s/ Dorothy M. Weber
DOROTHY M. WEBER, *pro hac vice*
Shukat, Arrow, Hafer, Weber &
Herbsman, LLP
Attorney for Estate of Nina Simone

22 The 9/25/13 conference is
23 VACATED. Parties to notify Court
of available dates.

/s/ Julia D. Greer
JULIA D. GREER
Coblentz, Patch, Duffy & Bass, LLP,
Attorney for Sony Music Entertainment,
erroneously sued as Sony Music
Holdings, Inc.

24 IT IS SO ORDERED.

25 DATED: September 16, 2013

Hon. Maria-Elena James

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2 Listing of counsel filing this paper:

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